



# Safeguarding & Child Protection Policy

## POLICY REVIEW

This policy will be reviewed in full by the Governing Body no less than annually.

The policy was last reviewed and agreed by the Governing Body in September 2022.

It is due for review in July 2023.

Signature: **Dr S Peacock**  
Headteacher

Date: 26/09/22

Signature: **Mrs L Dalton**  
Chair of Governors

Date: 26/09/22

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## 1. INTRODUCTION

Safeguarding is defined as: *protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.* (Working Together to Safeguard Children, DfE, 2018, p6)

This Child Protection Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school.

In particular, this policy should be read in conjunction with:

- the behaviour policy;
- the anti-bullying policy;
- the drugs policy;
- the equality and diversity policy;
- the health & safety policy;
- the SEND policy;
- the welfare strategy;
- the whistleblowing policy;
- the managing medication & sickness policy;
- the staff behaviour policy (sometimes called a code of conduct);
- the safeguarding response to children who go missing from education;
- the role of the DSL (including the identity of the DSL and any deputies).

**Copies of policies and a copy of Part One of KCSiE will be provided to staff at induction. All policies are available on FROG and the school website at all times and a link to KCSiE is included in this policy at Appendix 1.** This policy is available in hard copy on request. A copy of the policy is available for inspection from Reception during the School day. This policy can be made available in large print or other accessible format.

**Purpose of a Child Protection Policy**

To inform staff, parents, volunteers and governors about the school's responsibilities for safeguarding children.  
To enable everyone to have a clear understanding of how these responsibilities should be carried out.

**London Safeguarding Children Partnership Procedures**

The school follows the procedures established by the Sutton Local Safeguarding Children Partnership (LSCP); a guide to procedures and practice for all agencies in Sutton working with children and their families.

<http://www.suttonlscp.org.uk/>

**School Staff & Volunteers**

All school and college staff have a responsibility to provide a safe environment in which children can learn.

School staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children.

All school staff will receive appropriate safeguarding children training (which is updated regularly – at least every three years), so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow. In addition, all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Temporary staff and volunteers will be made aware of the safeguarding policies and procedures by the DSL, including The Child Protection Policy and Staff Behaviour Policy (code of conduct).

**Mission Statement**

Establish and maintain an ethos and culture where children feel secure, are encouraged to talk, and are listened and responded to when they have a worry or concern. Children should be taken seriously, kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Establish and maintain an ethos and culture where school staff and volunteers feel safe, are encouraged to talk and are listened and responded to when they have concerns about the safety and well-being of a child.

Ensure children know that there are adults in the school whom they can approach if they are worried.

Ensure that children who have additional/unmet needs are supported appropriately. This could include referrals to Early Help Services or Child Protection Contacts to specialist services if they are a child in need or have been / are at risk of being abused and neglected.

Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

Staff members working with children are advised to maintain an attitude of 'it could happen here' and 'it could be happening to this child', where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

**Implementation,  
Monitoring and  
Review of the Child  
Protection Policy**

The policy will be reviewed at least annually by the governing body. It will be implemented through the school's induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the DSL and through staff performance measures.

## **2. STATUTORY FRAMEWORK**

In order to safeguard and promote the welfare of children, the school will act in accordance with the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Education Act 2002 (Section 175/157)  
*Outlines that Local Authorities and School Governing Bodies have a responsibility to "ensure that their functions relating to the conduct of school are exercised with a view to safeguarding and promoting the welfare of children who are its pupils".*
- Sutton Local Safeguarding Children Partnership Procedures
- Keeping Children Safe in Education (KCSiE) (DfE, September 2022)
- Working Together to Safeguard Children (DfE 2018)
- Departmental advice: What to do if you are worried a child is being abused – advice for practitioners
- Departmental advice: Sexual violence and sexual harassment between children in schools and colleges
- The Education (Independent School Standards) Regulations 2014
- Sexual Offences Act (2003)
- Section 26, The Counter Terrorism and Security Act 2015 (PREVENT duty)
- Female Genital Mutilation Act 2003 (Section 74 ,Serious Crime Act 2015)
- Data Protection Act 2018 and General Data Protection Regulation (GDPR)
- Equality Act 2010;
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry. Includes taking someone overseas to force them to marry (whether or not the forced marriage takes place).
- Serious Violence Strategy 2018

### 3. THE DESIGNATED SAFEGUARDING LEAD

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school senior leadership team, is appointed to the role of DSL.

The DSL for Child Protection in this school is:

NAME: **Michelle Alletson MAL (Deputy Headteacher – Behaviour & Attitudes)**

The Deputy DSLs for Child Protection in this school are:

NAME: **Sarah Miller SMI (Assistant Headteacher – Y7+Y8)**

NAME: **Nick Rudd NRU (Assistant Headteacher – Y9)**

NAME: **Duncan Gillies DGI (Assistant Headteacher – Y10+Y11)**

NAME: **Chris Murphy CMU (Assistant Headteacher – Y12+Y13)**

During term time the DSL and or a Deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Individual arrangements for out of hours/out of term activities will be:

- Log the concern on CPOMS in the usual way, alerting the DSL
- Contact the relevant safeguarding team for the pupil's home borough for advice
  - Sutton Children First Contact Service (CFCS) 020 8770 6001
  - Merton Multi-Agency Safeguarding Hub (MASH) 020 8545 4226
- Complete and submit a referral to the relevant safeguarding team, if advised to do so, ensuring that a copy of the form submitted is uploaded to CPOMS

**The broad areas of responsibility for the DSL are:**

- Managing Child Protection referrals and cases
- Contacting the Sutton Children First Contact Service (CFCS) or Merton MASH teams when advice is needed regarding child protection concerns which possibly meet the threshold for statutory intervention
- Completing Child Protection referrals for all cases of suspected abuse or neglect where there is a risk of significant harm to the child/young person, Police where a crime may have been committed and to the Channel programme where there is a radicalisation concern

- Liaise with the Head Teacher to inform him/her of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a Child Protection referral by liaising with relevant agencies
- Support staff who make Child Protection referrals and other service referrals
- Share information with appropriate staff in relation to a child's looked after (CLA) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.
- Ensure they have details of the CLA's social worker and the name of the virtual school Head Teacher in the authority that looks after the child.

## **Training**

The DSL should undergo formal training every two years. The DSL should also undertake Prevent awareness training. In addition to this training, their knowledge and skills should be refreshed (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments) at least annually to:

1. Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
2. Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
3. Ensure each member of staff has access to and understands the school's safeguarding and child protection policy and procedures, especially new and part time staff
4. Be alert to the specific needs of children in need, those with special educational needs and young carers
5. Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
6. Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
7. Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online

8. Be able to keep detailed, accurate, secure written records of concerns, and Child Protection referrals or referrals to other agencies
9. Obtain access to resources and attend any relevant or refresher training courses
10. Encourage a culture of listening and responding to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them

**Raising Awareness: The DSL should:**

- Ensure the school's policies are known, understood and used appropriately.
- Work with the governing bodies or proprietors to ensure that the school's child protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure the safeguarding and child protection policy is available publicly and that parents are aware that advice regarding child protection concerns could be sought from Sutton CFCS or Merton MASH or other local safeguarding teams and that Child Protection referrals about suspected abuse or neglect may be made. Parents should be aware of the school's statutory role regarding safeguarding of children.
- Link with Sutton's Local Safeguarding Children's Partnership (LSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Ensure that when children leave the school, the file for safeguarding and any child protection information is sent to any new school/college as soon as possible but transferred separately from the main pupil file. The file should not be sent until the child is physically attending the new school.
- Obtain proof that the new school/education setting has received the safeguarding file for any child transferring
- Consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.



## 4. THE MANAGEMENT OF SAFEGUARDING

Governing bodies and proprietors must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in the school is always effective and complies with the law.

The responsibility of governing bodies, proprietors and management committees include ensuring that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare:

- Child protection policy
- staff behaviour policy (sometimes called the code of conduct)
- Part one of KCSiE and Annex A (specific safeguarding issues)
- Information regarding the role and identity of the designated safeguarding lead (and any deputies) should be provided to all staff on induction

Governing bodies and proprietors should have a senior board level (or equivalent) lead to take **leadership** responsibility for their school's safeguarding arrangements.

The nominated governor / trustee for child protection is:

NAME: Mr Kevin Mohr

The headteacher should ensure that:

- the above policies and procedures, adopted by governing bodies and proprietors, and particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.
- the school works with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.
- arrangements are in place that set out clearly the principles for sharing information within the school and with safeguarding partners, other organisations, agencies and practitioners as required.
- child protection files are transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained
- all staff undergo child protection training (including online safety) at induction. The training should be regularly updated.
- all staff receive regular safeguarding and child protection updates (for example, via email, e-

bulletins, staff meetings) as required, and at least annually

- all staff have the opportunity to contribute to and shape safeguarding arrangements and child protection policy.
- children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum. Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) have been mandatory since September 2020.
- governing bodies and proprietors should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised.
- the school has written recruitment and selection policies and procedures in place and at least one of the persons who conducts an interview has completed safer recruitment training
- there are procedures in place to manage concerns and allegations against staff including volunteers and supply
- there are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned
- all staff are clear about the school's policy and procedures with regard to peer on peer abuse.
- the child's wishes and feelings are taken into account when determining what action to take and what services to provide, when there is a safeguarding concern. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at heart.
- all of the DSLs, including deputies, undergo formal child protection training every two years, in line with KCSIE procedures, and receive regular, at least annual, safeguarding updates via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments, for example.
- the welfare of children and young people is prioritised and create a culture where staff are confident to challenge senior leaders over any safeguarding concerns
- ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material.

## 5. WHEN TO BE CONCERNED

Knowing what to look for is vital for the early identification of abuse and neglect. All staff should be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse	
A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	
Child	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size	Aggression towards others, emotional and behaviour problems
Burns and Scalds – shape, definition, size, depth, scars	
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injuries	Fabricated or induced illness
Parent	Family/environment
Parent with injuries	History of mental health, alcohol or drug misuse or domestic violence.
Evasive or aggressive towards child or others	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Explanation inconsistent with injury	Marginalised or isolated by the community.
Fear of medical help / parents not seeking medical help	Physical or sexual assault or a culture of physical chastisement.
Over chastisement of child	

### Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Child	
Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a 'loner'
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour
Parent	Family/environment
Observed to be aggressive towards child or others	Marginalised or isolated by the community.
Intensely involved with their children, never allowing anyone else to undertake their child's care.	History of mental health, alcohol or drug misuse or domestic violence.
Previous domestic violence	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
History of abuse or mental health problems	Past history in the care of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Mental health, drug or alcohol difficulties	Wider parenting difficulties
Cold and unresponsive to the child's emotional needs	Physical or sexual assault or a culture of physical chastisement.
Overly critical of the child	Lack of support from family or social network.

## Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Child

Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships

### Parent

### Family/environment

Failure to meet the child's basic essential needs including health needs	Marginalised or isolated by the community.
Leaving a child alone	History of mental health, alcohol or drug misuse or domestic violence.
Failure to provide adequate caretakers	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Keeping an unhygienic dangerous or hazardous home environment	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Unkempt presentation	Lack of opportunities for child to play and learn
Unable to meet child's emotional needs	Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
Mental health, alcohol or drug difficulties	

## Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. The activities may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children.

The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it and the school's policy and procedures for dealing with it (see Appendix 5).

Child	
Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Poor attention / concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in school work habits, become truant
Sexually exploited or indiscriminate choice of sexual partners	
Parent	Family/environment
History of sexual abuse	Marginalised or isolated by the community.
Excessively interested in the child.	History of mental health, alcohol or drug misuse or domestic violence.
Parent displays inappropriate behaviour towards the child or other children	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Conviction for sexual offences	Past history in the care of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Comments made by the parent/carers about the child.	Grooming behaviour
Lack of sexual boundaries	Physical or sexual assault or a culture of physical chastisement.

If staff have any concerns about a child's welfare, they should act on them immediately. If staff have a concern, they should follow this policy and speak to the DSL/DDSL. The DSL/DDSL are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to a safeguarding concern.

**Any staff member should be able to make a Child Protection referral to Children's Services if necessary, as outlined on page 6 of this policy.**

All staff should be aware of the process for making Child Protection referrals to Children's Services for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm from abuse or neglect) that may follow a referral, along with the role they might be expected to play in such assessments.

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

**Options will then include:**

- managing any support for the child internally via the school's own pastoral support processes;
- completing an Early Help referral or referral to external support service.
- completing a Child Protection referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer significant harm from abuse or neglect.

## **Contextual Safeguarding**

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

All staff, but especially the DSL and their Deputy DSLs, should be considering the context within which safeguarding incidents and/or behaviours occur. Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

## **A child centred and coordinated approach to safeguarding**

Safeguarding and promoting the welfare of children is **everyone's responsibility**. In order to fulfil this responsibility effectively, each professional should make sure their approach is **child centred**. This means that they should consider, at all times, what is in the best interests of the child.

Schools and their staff form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the **best interests** of the child at all times.

## Children who may require Early Help

Early Help services help practitioners and families find information and support to prevent escalation of needs and crisis.

All staff should be aware of the **early help process**, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL any ongoing/escalation of concerns so that consideration can be given to a Child Protection referral to Children's Services if the child's situation doesn't appear to be improving.

If early help is appropriate, the DSL or a Deputy will generally lead on liaising with other agencies and completing an Early Help referral as appropriate.

**Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:**

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan – EHCP);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- has or has had a social worker;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

School and college staff members should be aware of the main categories of maltreatment: **physical abuse, emotional abuse, sexual abuse and neglect** as well as being aware of the indicators of maltreatment and **specific safeguarding issues** so that they are able to identify cases of children who may be in need of help or protection.



## **Children with special educational needs and disabilities:**

Additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration;
- Awareness that children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs;
- Communication barriers and difficulties
- Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child)
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.
- A disabled child's understanding of abuse.
- Lack of choice/participation

## **Child on child abuse**

**All** staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their

permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- initiation/hazing type violence and rituals.

All staff should be aware that abuse is abuse and child on child abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. If staff have any concerns regarding child on child abuse they should speak to the DSL or deputy DSL.

In order to minimise the risk of child on child abuse, the school:

- Provides a developmentally appropriate PSHE and RSE curriculum which develops pupils’ understanding of acceptable behaviour and keeping themselves safe, including issues of consent, healthy and unhealthy relationships, bullying vs banter, intimate relationships and respectful relationships
- Have strong pastoral systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued.
- Ensure victims, perpetrators and any other child affected by child on child abuse will be supported through the school’s own support systems and external agencies as required
- Develops robust risk assessments where appropriate
- Have relevant policies in place (e.g. behaviour policy)

Where there is an allegation or concern that a child has abused others, the school will refer to Part Five of KCSiE DfE 2022 – ‘Child on child sexual violence and sexual harassment’

**Keeping children safe in education - GOV.UK ([www.gov.uk](http://www.gov.uk))**

### **Serious violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries

Unexplained gifts/new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending such as theft or robbery.

## **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

Whilst age may be the most obvious, the power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

CSE and CCE can affect children both male and female. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact or non-contact activities. CSE may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities, including 16 and 17 year old children who can legally consent to have sex. Some children may not realise that are being exploited e.g. they believe that are in a genuine romantic relationship.

## **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriate trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and adulthood.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the procedures in this policy and speaking to the school's DSL.

## **PREVENT: Safeguarding Children and Young People from Radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from radicalisation must be part of all school and college safeguarding approaches.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
- Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

All schools and colleges are subject to a duty known as **the Prevent Duty** under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have “due regard to the need to prevent people from being drawn into terrorism.”

There are signs and vulnerability factors that may indicate a child is susceptible to radicalisation or is in the process of being radicalised. It is possible to protect vulnerable people from extremist thinking and intervene to safeguard those at risk of radicalisation. Staff must be alert to changes in children’s behaviour, which could indicate that they may be in need of help or protection. Staff must act proportionately to the concern using the Prevent ‘notice, check, share’ approach, which may lead to the DSL making a Prevent referral.

## **Domestic Abuse**

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition captures different types of relationships including ex-partners and family members. It includes a range of different abusive behaviours including physical, emotional and economic abuse and controlling and coercive behaviour. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse and the abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

## 6. DEALING WITH A DISCLOSURE

If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.

If a child discloses that he or she has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child, but not make promises which might not be possible to keep
- **Never** promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child.
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify what is being said.
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping)
- Pass the information to the DSL without delay. **At Glenthorne, the disclosure or concern should be logged on CPOMS and the member of staff/volunteer should speak to the DSL as soon as possible and certainly by the end of the day.** If a DSL or Deputy is not available, the member of staff must inform a senior member of staff and complete a child protection referral to Children's Services if the disclosure indicates that the child may be at risk of immediate harm and/or have suffered significant harm to ensure reporting to Police and/or Children's Services where necessary is not delayed.

### Support

Dealing with a disclosure from a child, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the DSL.

**If a school /college staff member receives a disclosure about potential harm caused by another staff member, they should see section 11 of this policy– *Allegations involving school staff/volunteers.***

## 7. RECORD KEEPING

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the DSL.

- Record as soon as possible after the conversation using the school's Child Protection recording system (CPOMS). Information should not be sent by email or voicemail.
- Ensure the date, time, place is recorded, and any noticeable non-verbal behaviour and the words used by the child
- Use the body map on CPOMS to indicate the position of any injuries and a clear description of the injury, if applicable
- Record statements and observations rather than interpretations or assumptions
- Do not destroy the original records in case they are needed by a court. Pass them to the DSL for filing.
- All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The School has a number of privacy notices which explain how the School will use personal data for the benefit of pupils and parents/carers. The privacy notices are published on the School's website. The DSL will ensure that all safeguarding records are managed in accordance with the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the School's data protection policy and information security policy.

All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

## 8. CONFIDENTIALITY

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools.

- All staff in schools, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies.
- Staff/volunteers who receive information about children and their families in the course of their work should share that information **only** within appropriate professional contexts.

### Sharing information

#### Information sharing: advice for practitioners ([publishing.service.gov.uk](https://publishing.service.gov.uk))

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## 9. SCHOOL PROCEDURES

If any member of staff is concerned about a child, he or she must inform the DSL. The DSL will decide whether the concerns should be raised to Children's Services and if deemed to have met the threshold a Child Protection referral will be completed. If a Child Protection referral to Children's Services is made, the DSL will discuss the referral with the parents, unless to do so would place the child at further risk of harm.

While it is the DSL's role to make Child Protection referrals, **any staff member can make a Child Protection referral to Children's Services if a child is in immediate danger or is at risk of harm** (e.g. concern that a family might have plans to carry out FGM, Forced Marriage etc). In these circumstances a Child Protection referral should be made to Children's Services and/or the Police immediately. Where Child Protection referrals are made by another member of staff, the DSL should be informed as soon as possible and the concern and referral form logged on CPOMS.

If a **teacher** (persons employed or engaged to carry out teaching work at schools and other institutions in England) in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police via 101. **This is a mandatory reporting duty.**

If the allegations raised are against other children, the school should follow the school's safeguarding policy in relation to child on child abuse and the school's anti-bullying policy.

The member of staff must record information regarding the concerns on CPOMS on the same day. The recording must be a clear, precise and a factual account of any verbal disclosures and observations.

Particular attention should be paid to the attendance and development of any child about whom the school has concerns, or who has been identified as being the subject of a Child Protection Plan and a written record will be kept.

If a pupil who is/or has been the subject of a child protection plan changes school, the DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving school, in a secure manner, and separate from the child's academic file.

The DSL is responsible for making the senior leadership team aware of trends in behaviour that may affect pupil welfare. If necessary, training will be arranged.



## **10. COMMUNICATION WITH PARENTS**

Glenthorne High School will ensure the Safeguarding & Child Protection Policy is available publicly on the school website.

Parents should be informed prior to a Child Protection referral, unless it is considered to do so might place the child at increased risk of significant harm by:

- The behavioural response it prompts e.g. the possible response of the alleged abuser, increased risk of self-harm by the child if alleged abuser informed
- Leading to an unreasonable delay
- Leading to the risk of loss of evidential material

The school will endeavour to ensure that parents understand the responsibilities placed on the school staff for safeguarding children.

Where reasonably possible, schools should hold more than one emergency contact number for each child.

## **11. ALLEGATIONS OF ABUSE MADE AGAINST TEACHERS AND OTHER STAFF, INCLUDING SUPPLY TEACHERS AND VOLUNTEERS**

An allegation **that may meet the harm threshold** is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way which indicates he or she would pose a risk of harm to children
- Behaved or may have behaved in a way that indicated they may not be suitable to work with children.

This relates to members of staff, supply staff and volunteers who are currently working in any school regardless of whether the school is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

**What staff should do if they have safeguarding concerns about another member of staff who may pose a risk of harm to children:**

- If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, this is to be referred to the headteacher
- Where the headteacher is the subject of an allegation, the chair of governors should discuss the allegation immediately with the Local Authority Designated Officer(s) LADO.
- Staff should consider discussing any concerns with the designated safeguarding lead (DSL) in order to look after the welfare of the child.

The Chair of Governors in this school is:

NAME:  
Mrs Laura Dalton

CONTACT VIA:  
[Ms Alyson Chan: ach@glenthorne.sutton.sch.uk](mailto:ach@glenthorne.sutton.sch.uk)

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present.

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Headteacher/Chair of Governors will not investigate the allegation itself, or take written or detailed statements, but will conduct basic enquiries to establish the facts and help determine whether there is any foundation to the allegation such as:

- Was the individual in school at the time of the allegations
- Did the individual or could the individual have come into contact with the child
- Are there any witnesses
- Was there any CCTV footage

The Headteacher/Chair of Governors will refer all allegations that may meet the harm threshold to the Local Authority Designated Officer (LADO). Allegations that do not meet the harm threshold, known as low-level concerns, will be addressed through application of the School's staff code of conduct. If there is doubt as to whether the information which has been shared is a low-level concern or meets the harm threshold, the School will consult with the LADO.

If it is decided that the allegation requires a child protection strategy meeting or joint evaluation meeting, this will take place in accordance with the Sutton Local Safeguarding Children Partnership procedures.

If it is decided it does not require a child protection strategy meeting or joint evaluation meeting, the LADO will provide the employer with advice and support on how the allegations should be managed.

The Headteacher should, as soon as possible, **following briefing** from the Local Authority Designated Officer inform the subject of the allegation.

Where a staff member feels unable to raise an issue with their employer/through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

#### **What school staff should do if they have concerns about safeguarding practices within the school?**

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or education setting's safeguarding arrangements.
- Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the school or college's senior leadership team.

#### **Safer working practice**

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook/school code of conduct/staff behaviour policy and Safer Recruitment guidance.

## APPENDIX 1: KEEPING CHILDREN SAFE IN EDUCATION (DfE 2022)

### PART ONE: INFORMATION FOR ALL SCHOOL AND COLLEGE STAFF

#### ANNEX B: FURTHER INFORMATION

This Safeguarding & Child Protection Policy provides the link below to the full Keeping Children Safe in Education (KCSiE) document, to ensure that staff always have access to the most up-to-date version of the document.

Keeping Children Safe in Education 2022  
[Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106535/Keeping-children-safe-in-education-2022.pdf)

**All** staff must access and have read **Part One** of Keeping Children Safe in Education.

Annex A is a condensed version of Part One of Keeping Children Safe in Education.

All staff also advised to read **Annex B** of KCSiE for further information about specific forms of abuse and safeguarding issues. Reading these sections assists staff to understand their role and discharge their responsibilities as set out in this guidance. Staff are encouraged to seek clarity from designated staff regarding any of the content.

**All staff will be asked to indicate they have read and understood Part One and Annex B by completing an online questionnaire assessing their knowledge.**

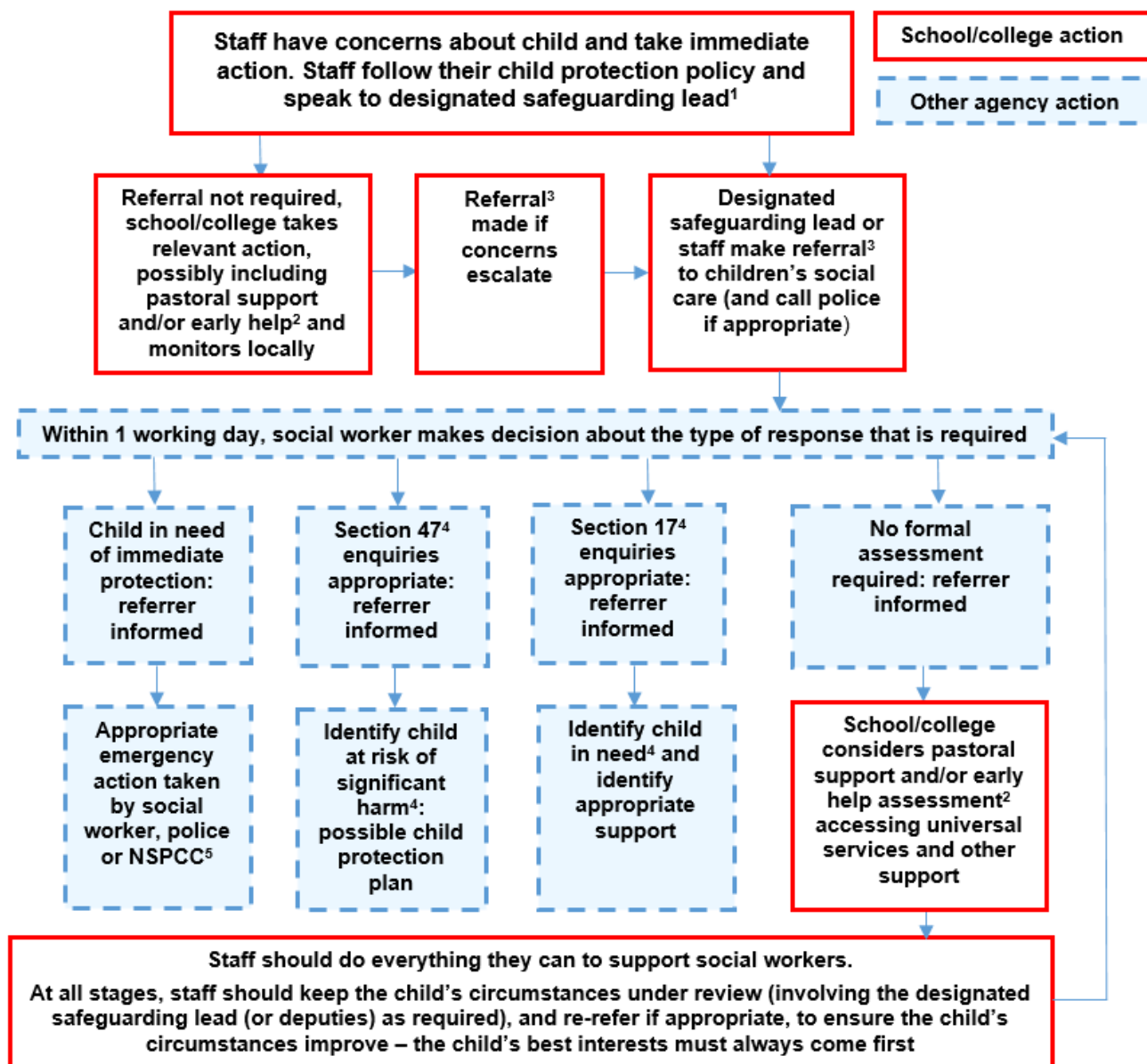
Other relevant documents for staff are:

Working Together to Safeguard Children (2018)  
[Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106535/Working-Together-to-Safeguard-Children-2018.pdf)

What to do if you are worried a child is being abused (2015)  
[Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106535/What-to-do-if-you-are-worried-a-child-is-being-abused-2015.pdf)

## APPENDIX 2: ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

### FLOWCHART



## APPENDIX 3: POLICY ON HOW TO RESPOND TO THE SHARING OF NUDES AND SEMI-NUDES

Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK ([www.gov.uk](http://www.gov.uk))

At Glenthorne High School we will not tolerate sharing of nudes and semi-nudes. It is inappropriate and can have extremely damaging and long-lasting consequences. This policy has been created to provide a guide for both staff and pupils as to how the school will proceed and what steps should be taken should an incident of sharing nudes/semi-nudes be reported or suspected.

### What do we mean by sharing nudes and semi-nudes?

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

### What staff must do if an incident comes to your attention:

**Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately.**

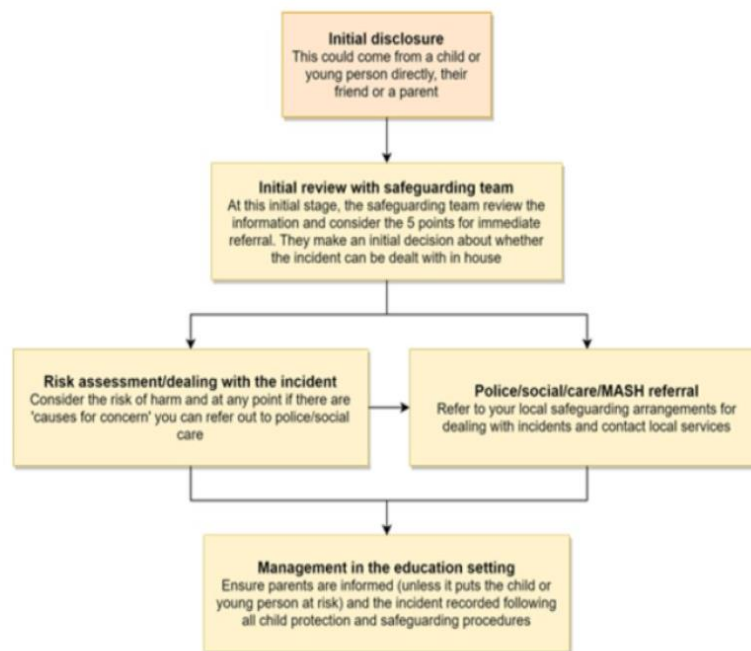
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Sharing of nudes and semi-nudes is identified as unacceptable behaviour in the school Behaviour Policy and the possession of pornography is prohibited in school. The misuse of IT, such as sharing nudes or semi-nudes, inappropriate comments on social media, being the object of cyber-bullying and online grooming are all potential welfare concerns and identified as such in the Safeguarding and Child Protection Policy and our E-safety Policy.

We have a responsibility to work with pupils, parents and carers in ensuring that all pupils are fully aware of the dangers and possible repercussions of sharing nudes and semi-nudes. In school, this information will be communicated to pupils during PSHE lessons and in assemblies.

The initial response to an incident will be to ensure that the pupils involved are safeguarded appropriately. Consideration will then be given to whether any disciplinary action needs to be taken in line with the school behaviour policy.

### Flowchart for responding to incidents



The 5 points the DSL will consider are:

- Whether the incident involves an adult
- Whether the child has been coerced, groomed or blackmailed
- Whether the image depicts sexual acts that are unusual for the child's stage of development or are violent
- Whether any pupil in the image is under 13
- Whether the pupil or pupils involved are at immediate risk for example presenting as suicidal or self-harming

This policy will be reviewed in **July 2023**.

## APPENDIX 4: E-SAFETY POLICY

An e-safety incident may involve staff and/or pupils in relation to their use of the internet or any other communications technology. All adults working within the school have a responsibility to protect children from harmful and inappropriate material and keep them safe online (including when they are online at home). An e-safety incident could be distressing, illegal or harmful to the pupil and as such, this policy sits alongside our Safeguarding and Child Protection policies and procedures as well as our Policy on how to respond to the sharing of nudes and semi-nudes. In accordance with the recommendations from the **Keeping Children Safe in Education (September 2022)** this policy seeks to ensure that:

- all members of school community know how to use the internet and other forms of communication technology safely and responsibly
- any issues of child protection (self-harm, child sexual exploitation [CSE], female genital mutilation [FGM] and preventing radicalisation) resulting from internet use are promptly addressed
- procedures are in place to deal with e-safety incidents
- the school implements local and national and statutory guidance

### DEFINITION

E-Safety incidents may be defined as the following:

- Bullying via email, texting or social networking services
- False profiles created on social networking sites
- Finding inappropriate content whilst searching the internet
- Using another's password to post false information
- Inappropriate sexual comments or enticements
- Using Bluetooth to manipulate another person's communication device

### THE ROLE OF INDIVIDUAL STAFF

#### All Staff

- All staff should follow the e-safety protocol listed at the end of this policy
- Depending on the level of risk, staff will refer e-safety incidents to the appropriate Head of Year or the appropriate Designated Safeguarding Lead.
- Staff will follow the guidelines in the school's ICT Acceptable Use policy (See ICT Acceptable use policy)
- Staff will follow the standards laid out in the Teacher's Standards.

#### Head of PSHE

- Will ensure e-safety and CEOP lessons will be delivered as part of the PSHE curriculum. For specific curriculum content see the ICT policy.

#### Head of Year

- Will apply the sanctions as laid out in the school's behaviour policy for all low risk level e-safety incidents
- Will ensure that e-safety is discussed as part of tutor time and in year assemblies as



appropriate

- Will liaise with parents when following up an e-safety incident

#### Deputy Headteacher - Designated Safeguarding Lead

- Will ensure that staff are kept up to date about developments in e-safety through staff meetings, the staff room and the whole staff bulletin
- May liaise with parents when following up an e-safety incident
- Will liaise with other relevant agencies (Police, MASH, Children's Social Care) when dealing with a high risk level e-safety incident
- Will oversee safeguarding alerts provided by Smoothwall software package

#### Network Manager

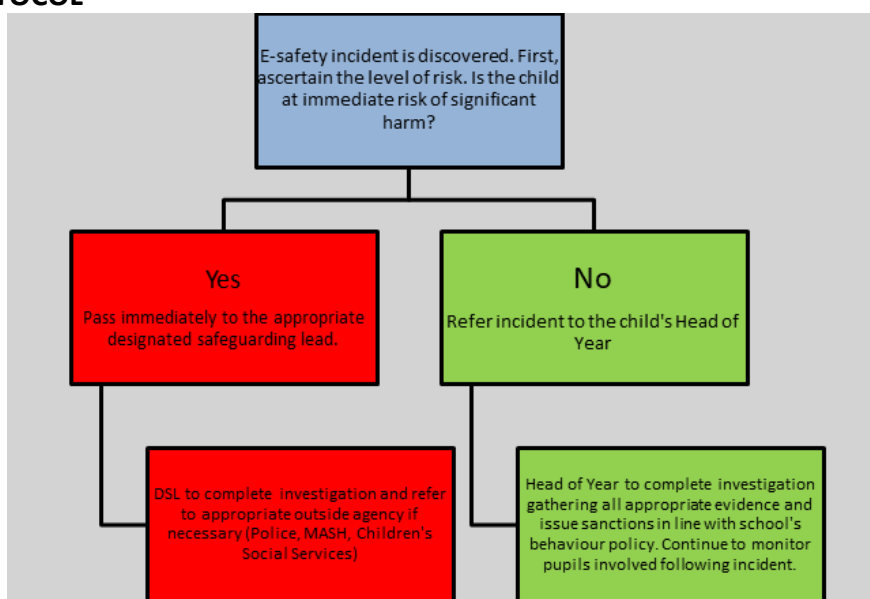
- Will block inappropriate sites and monitor the use of the school internet and email accounts (staff and students) using Smoothwall software package
- Will alert the DSL to any concerns raised by the LA's monitoring systems
- Will alert the LA to any concerns

#### DEFINITION OF LOW AND HIGH LEVEL RISK E-SAFETY INCIDENTS

The following are defined as low- and high-level risk e-safety incidents:

LOW LEVEL	HIGH LEVEL
Using another's password to post false information	Sharing nudes/semi-nudes
Bullying via text, social media or email	Inappropriate sexual comments or enticements
	Finding and viewing sexual or inappropriate content whilst using the internet
	Searching the internet to access information on self-harm, suicide
	Incidents which indicate online radicalisation or extremism

#### E-SAFETY PROTOCOL



This policy will be reviewed in **July 2023**

## APPENDIX 5: SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

This advice sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do if it does occur, or is alleged to have occurred. This advice is in accordance with the recommendations from the 'Sexual Violence and Sexual Harassment between Children in Schools and Colleges' May 2018 DfE document And Keeping Children Safe in Education (2022).

### Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children and school staff are supported and protected as appropriate, if they may have witnessed or been affected the incident(s).

Whilst **any** report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Schools should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and
- understanding that all of the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language.

Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers.

Children who are lesbian, gay, bi, or trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

### **Sexual violence**

For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape
- Assault by Penetration
- Sexual Assault. A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

### **Sexual harassment**

For the purpose of this advice, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment can include:

- sexual comments;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone;
- online sexual harassment

Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

### **Harmful sexual behaviour**

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour should be considered in a child protection context.

### **Legal responsibilities**

Schools have a statutory duty to safeguard and promote the welfare of the children at their school. All schools are required by law to have a behaviour policy and measures in place to prevent all forms of bullying. All maintained secondary schools must teach sex and relationship education (SRE).

### **The role of education in prevention**

The most effective preventative education programme will be through a whole-school approach that prepares pupils for life in modern Britain. Glenthorne has a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of school life. This will be underpinned

by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the whole curriculum to tackle such issues as:

- healthy and respectful relationships;
- what respectful behaviour looks like;
- consent;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- that sexual violence and sexual harassment is always wrong; and
- addressing cultures of sexual harassment.

Good practice allows children an open forum to talk things through. Such discussions can lead to increased safeguarding reports. Children should be made aware of the processes to raise their concerns or make a report and how any report will be handled. A child making a report or raising a concern, either as a victim or as a witness, does not necessarily have to give their name. The school will still take the report seriously and take appropriate action where possible. However, it should be noted that the school might have to identify the children, in order to protect and support them.

### **Responding to reports of sexual violence and sexual harassment**

Reports of sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure.

Ultimately, any decisions are for the school to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role, using their professional judgement and being supported by other agencies, such as children's social care and the police as required.

The police will be important partners where a crime might have been committed. Where a report of rape, assault by penetration or sexual assault is made, the starting principle is that this should be referred on to the police. Referrals to the police will often be a natural progression of making a referral to children's social care.

### **The immediate response to a report**

#### **Responding to the report**

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

As per Part One of Keeping Children Safe in Education, all staff should be trained to manage a report. However, effective safeguarding practice includes:

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

- recognising a child is likely to disclose information to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes, especially if a second member of staff is present. However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child. [See guidance in the Anti-Sexting Policy in Appendix A]
- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

### **Considering confidentiality and anonymity**

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

The school should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. The designated safeguarding lead (or a deputy) should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk);
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care; and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, we will be aware of anonymity, witness support and the criminal process in general so we can offer support and act appropriately.

As a matter of effective safeguarding practice, we will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.

We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

### **Risk Assessment**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and students and putting adequate measures in place to protect them and keep them safe.

### **Action following a report of sexual violence and/or sexual harassment**

The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident(s)
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children.
- is the alleged incident is a one-off or a sustained pattern of abuse?;
- are there ongoing risks to the victim, other children, adult students or school staff?; and
- other related issues and wider context.

**Immediate** consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

The starting point regarding any report should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important, is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'.

When to inform the alleged perpetrator will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school should speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations.

There are four likely scenarios for schools to consider when managing any reports of sexual violence and/or sexual harassment. Whatever the school's response, it should be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

1. **Manage Internally**
2. **Early Help**
3. **Referrals to children's social care**
  - Where a child has been harmed, is at risk of harm, or is in immediate danger, schools should make a referral to local children's social care.
  - Schools should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school.
4. **Reporting to the police**
  - Any report to the police will generally be in parallel with a referral to children's social care (as above).

### **Managing any delays in the criminal process**

Schools **should not wait** for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children and adult students in the school. The risk assessment will help inform any decision.

### **The end of the criminal process**

If a child is convicted or receives a caution for a sexual offence, the school should update its risk assessment, ensure relevant protections are in place for all children at the school and, if it has not already done so, consider any suitable action in light of their behaviour policy. If the perpetrator remains in the same school as the victim, the school should be very clear as to their expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school thinks are reasonable and proportionate with regard to the perpetrator's timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school. It will be important that the school ensure both the victim and alleged perpetrator remain protected, especially from any bullying or harassment (including online).

Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school should continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. Schools should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

### **Ongoing response**

#### **Safeguarding and supporting the victim**

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse.
- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis.
- Victims may not disclose the whole situation immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged.
- A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment.
- It may be necessary for the school to maintain arrangements to protect and support the victim for a long time.
- It is important that the school do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
- Whilst they should be given all the necessary support to remain at Glenthorne, if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).
- It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs.

#### **Safeguarding and supporting the alleged perpetrator**

- The school will have a difficult balancing act to consider. On one hand they need to safeguard the victim (and all other children, adult students and staff at the school) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions.
- A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school.
- Consider the age and the developmental stage of the alleged perpetrator and nature of the allegations.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis.



- It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children, adult students and staff.

## **Discipline and the alleged perpetrator**

### **Schools**

With regard to the alleged perpetrator, advice on behaviour and discipline in schools is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. Disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for the school and should be carefully considered on a case-by-case basis. The school should consider if, by taking any action, they would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or children's social care should help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach their own view about what happened while an independent investigation is considering the same facts.

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. The school should be very clear as to what its approach is and whether any action taken is preventative or forward-looking action to safeguard the victim or perpetrator, or disciplinary action to punish a perpetrator for past conduct, or whether it is really both.

### **Working with parents and carers**

The school will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportional in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. Schools should carefully consider what information they provide to the respective parents or carers about the other child involved and when they do so. In some cases, children's social care and/or the police will have a very clear view and it will be important for the school to work with relevant agencies to ensure a consistent approach is taken to information sharing.

It is good practice for the school to meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

It is also good practice for the school to meet with the alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact the alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed.

### **Safeguarding other children**

Consideration should be given to supporting children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.

Following any report of sexual violence or sexual harassment, it is likely that some children will take “sides”. The school should be doing all they can to ensure both the victim and alleged perpetrator, and any witnesses, are not being bullied or harassed.

Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator and a very high likelihood that friends from either side could harass the victim or alleged perpetrator online and/or become victims of harassment themselves.

A whole school approach to safeguarding, a culture that makes clear that sexual violence and sexual harassment is always unacceptable, and a strong preventative education programme will help create an environment in which all children at the school are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

This policy will be reviewed in **July 2023**

## APPENDIX 6: LONDON BOROUGH OF SUTTON CONTACT DETAILS

For safeguarding enquiries, the DSL will contact the Education Safeguarding Team:

Hayley Cameron, Education Safeguarding Manager  
[hayley.cameron@cognus.org.uk](mailto:hayley.cameron@cognus.org.uk) 07736 338180

Stephen Welding, Education E-Safety Adviser  
[stephen.welding@cognus.org.uk](mailto:stephen.welding@cognus.org.uk) 07768 387330

Mick Bradshaw, Adviser for Outdoor Education  
[mick.bradshaw@cognus.org.uk](mailto:mick.bradshaw@cognus.org.uk) 07736 338471

Gillian Bush, Education Lead in MASH (Multi-agency Safeguarding Hub)  
[gillian.bush@cognus.org.uk](mailto:gillian.bush@cognus.org.uk) 07701 280793

To refer a concern about a child:

- Multi-agency Safeguarding Hub (MASH) [childrensfirstcontactservice@sutton.gov.uk](mailto:childrensfirstcontactservice@sutton.gov.uk) 020 8770 6001
- Out of hours Emergency Duty Team: 020 8770 5000
- Single Point of Access (SPA) for Child and Adolescent Mental Health Services: 0203 513 3800
- Sima Hirani, Lead LADO (Local Authority Designated Officer) [lado@sutton.gov.uk](mailto:lado@sutton.gov.uk) (secure email) 020 770 4776